

THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IDA PAVLICHENKO,  
Plaintiff

V.

MICHAEL CHERTOFF, as Secretary of the  
Department Homeland Security; EDUARDO  
AGUIRRE, as Acting Director of the Bureau of  
Citizenship & Immigration Services; DENNIS C.  
RIORDAN, District Director of the Bureau of  
Citizenship & Immigration Services for Boston,  
Massachusetts

Defendants

CIVIL ACTION FILE NO.

2005 – 10429 RGS

MOTION FOR DEFAULT JUDGMENT

NOW comes the plaintiff, Ida Pavlichenko, by and through the undersigned counsel, and hereby requests this Honorable Court to enter a default judgment against the defendants, Michael Chertoff, Secretary of the Department of Homeland Security, Eduardo Aguirre, Acting Director of the U.S. Citizenship & Immigration Services, and Denis C. Riordan, District Director of the U.S. Citizenship & Immigration Services for Boston, in reference to the above-entitled matter, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure. As grounds for this motion the defendant submits as follows:

The defendant, Michael Chertoff, Secretary of the Department of Homeland Security, was served with the complaint on April 18, 2005 and to date has not filed a responsive pleading.

The defendant, Eduardo Aguirre, Acting Director of the Bureau of Citizenship & Immigration Services, was served with the complaint on April 6, 2005 and to date has not filed a responsive pleading.

The defendant, Denis C. Riordan, District Director of the Bureau of Citizenship & Immigration Services for Boston, was served with the complaint on April 5, 2005 and to date has not filed a responsive pleading.

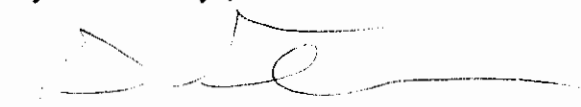
#### Relief

The plaintiff, Ida Pavlichenko, hereby requests that the judgment be the grant of naturalization pursuant to 8 U.S.C. 1447(b), as further set forth in the attached proposed default judgment.

#### Grounds for Relief

The Court should enter the judgment requested against the defendants Michael Chertoff, Secretary of the Department of Homeland Security, Eduardo Aguirre, Acting Director of the U.S. Citizenship & Immigration Services, and Denis C. Riordan, District Director of the U.S. Citizenship & Immigration Services for Boston, and in favor of the plaintiff, Ida Pavlichenko because she has met all of the necessary requirements, The defendants have failed to file a responsive pleading and it is in the interest of justice that she be naturalized forthwith.

The Plaintiff,  
By his Attorneys,

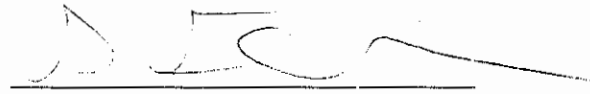


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**CERTIFICATE OF SERVICE**

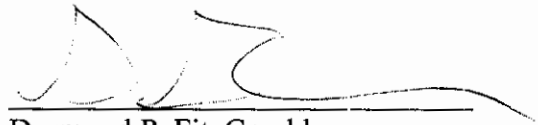
I, Desmond P. FitzGerald, do hereby certify that I have served a true and accurate copy of the forgoing Motion for Default Judgment, by mailing a copy thereof to the opposing party, Mr. Michael Chertoff, U.S. Department of Homeland Security, Washington, D.C. 20528 this 15<sup>th</sup> day of June, 2003.



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BBO No. 634881

**CERTIFICATE OF SERVICE**

I, Desmond P. FitzGerald, do hereby certify that I have served a true and accurate copy of the forgoing Motion for Default Judgment, by mailing a copy thereof to the opposing party, Mr. Dennis Riordan, U.S. Citizenship & Immigration Services, JFK Federal Building, Boston, MA 02213, this 15<sup>th</sup> day of June, 2003.



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**CERTIFICATE OF SERVICE**

I, Desmond P. FitzGerald, do hereby certify that I have served a true and accurate copy of the forgoing Motion for Default Judgment, by mailing a copy thereof to the opposing party, Mr. Eduardo Aguirre, U.S. Citizenship & Immigration Services, 425 Eye Street N.W., Room 7309, Washington, D.C. 20536, this 15<sup>th</sup> day of June, 2003.



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